

# Exhibit A

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*Steven D. Grierson*

1 COMP  
2 JOHN T. KEATING  
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12 *Gretchen Salomonson*

CASE NO: A-21-839603-C  
Department 31

**KEATING LAW GROUP**  
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LAS VEGAS, NEVADA 89148

DISTRICT COURT  
CLARK COUNTY, NEVADA

11 GRETCHEN SALOMONSON, individually,  
12 Plaintiff,  
13 vs.  
14 TARGET CORPORATION, a foreign  
15 corporation, D/B/A TARGET STORE 2568;  
16 DOES I through X, inclusive; ROE BUSINESS  
17 ENTITIES I through X, inclusive;  
18 Defendants.

Case No.:  
Dept. No.:

COMPLAINT

19 Plaintiff GRETCHEN SALOMONSON, by and through her attorneys of record, KEATING  
20 LAW GROUP, and for her Complaint against the Defendant alleges as follows:

GENERAL ALLEGATIONS

22 1. At all times relevant herein, GRETCHEN SALOMONSON ("Plaintiff") is and was  
23 a resident of the State of Nevada.

24 2. Defendant TARGET CORPORATION, ("Defendant"), is and at all relevant times  
25 to these proceedings, a foreign corporation, duly registered and licensed to conduct business  
26 in the State of Nevada.

27     ///  
28

3. The true names and capacities of Defendants named herein as DOES I through X, and ROE BUSINESS ENTITIES I through X, whether individual, corporate, associate, or otherwise, are presently unknown to Plaintiff, who, therefore, sues said defendants so designated herein is responsible in some manner for the events and occurrences referred to herein alleged, and Plaintiff will request leave of Court to amend this Complaint to insert the true names and capacities of DOES I through X, and ROE BUSINESS ENTITIES I through X, when the same have been ascertained and to join such defendants in this action.

4. Based upon information and belief, Defendant owned, maintained and controlled the property located at 695 S. Green Valley Parkway, Henderson, Nevada, commonly known as "Target."

5. On or about August 30, 2019, Plaintiff was a guest at Target Store #2568 located 695 S. Green Valley Parkway, Henderson, Nevada ("the property").

6. At that time and after she finished checking out and paying for her items, Plaintiff was injured when she slipped and fell on a liquid substance on the floor of the check stand area, thereby causing Plaintiff to sustain personal injuries as set forth herein.

**FIRST CLAIM FOR RELIEF**  
**(NEGLIGENCE)**

Plaintiff repeats and realleges each and every allegation contained in Paragraphs 1 through 6 of this Complaint and incorporates them by reference.

7. Defendant had a duty to use reasonable care in maintaining its premises including the duty of inspecting the premises and discovery of dangerous conditions.

8. Defendant had a duty to exercise due care while maintaining control of the property and to maintain the area in a reasonably safe condition to avoid injuries to others, including Plaintiff.

9. Defendant breached this duty when it carelessly, recklessly and in a negligent

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1 manner caused the property to be unreasonably slippery and wet, allowing a liquid substance  
2 to be on the floor of the check stand area, thereby causing Plaintiff to slip and fall. The  
3 incident caused Plaintiff to sustain damages and injuries.

4 10. Defendant breached this duty by failing to place signs, caution, warn, or  
5 otherwise make safe, the dangerous condition on or about the property.

6 11. The dangerous condition was caused as a direct result of the Defendant's  
7 failure to maintain the property in a reasonable and safe manner/condition.

8 12. Defendant knew, or reasonably should have known, that the dangerous  
9 condition existed on or about the property.

10 13. As a direct and proximate result of Defendant's negligence, Plaintiff sustained  
11 injuries to her head, neck, back, bodily limbs, organs and systems, all or some of which may  
12 be permanent and disabling, all to Plaintiff's damage in a sum in excess of Fifteen Thousand  
13 Dollars (\$15,000).

14 14. By reason of the premises and as a direct and proximate result of the  
15 aforementioned, Plaintiff was required to and did receive medical and other treatment for her  
16 injuries received in an expense that, in sum with all other damages, exceeds Fifteen Thousand  
17 Dollars (\$15,000). Said services, care, and treatment may continue in the future, in a  
18 presently unascertainable amount.

19 15. As a direct and proximate result of Defendant's negligence, Plaintiff has been  
20 required to, and has limited occupational and recreational activities, which have caused and  
21 shall continue to cause Plaintiff physical impairment, mental anguish, and loss of enjoyment  
22 of life, in a presently unascertainable amount.

23 16. As a direct and proximate result of Defendant's negligence, Plaintiff has been  
24 required to retain the services of an attorney to prosecute this action, and is, therefore,  
25 entitled to reasonable attorney's fees and costs incurred herein.

1 WHEREFORE, Plaintiff prays for Judgment to be entered against the Defendant on all  
2 of the forgoing claims for relief as follows:

3 a. For special damages in an amount in excess of FIFTEEN THOUSAND (\$15,000),  
4 and in an amount conforming to Plaintiff's proof at the time of trial;  
5 b. For general damages in an amount in excess of FIFTEEN THOUSAND (\$15,000),  
6 and in an amount conforming to Plaintiff's proof at the time of trial.  
7 c. For attorney's fees, costs and interest thereon; and  
8 d. For such other relief as the Court deems just and proper.

9  
10 DATED this 17<sup>th</sup> day of August, 2021.

11 K E A T I N G LAW GROUP  
12

13 /s/ JOHN T. KEATING /

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